

**JONATHAN STREETER**

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April 7, 2022

**FILED UNDER SEAL  
BY EMAIL**

Hon. Denise L. Cote, United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Court House  
500 Pearl Street  
New York, NY 10007-1312  
CoteNYSDChambers@nysd.uscourts.gov

Re: *United States v. Trevor L. Taylor*, No. 1:22-cr-00149 (DLC) (UNDER SEAL)

Dear Judge Cote:

I write on behalf of defendant Trevor L. Taylor to request a 45-day extension of time for Mr. Taylor to post the property securing his personal recognizance bond, which is currently due on April 7, 2022.

Mr. Taylor appeared before Your Honor on March 8, 2022, and pleaded guilty to a three-count information in a proceeding under seal. At the conclusion of that proceeding, Mr. Taylor and the U.S. Attorney's Office jointly proposed that the following bail conditions:

- \$5 million personal recognizance bond, secured by \$500,000 of property, with 30 days for Mr. Taylor to post the securing property;
- Surrender of Mr. Taylor's travel documents, with no new applications; and
- Travel limited to the United States, with prior notice to Pretrial Services if Mr. Taylor travels outside of the Southern District of Florida, the Southern District of New York, or points in between.

(Plea Hr'g Tr. at 21:3–22:11, Mar. 8, 2022.) We respectfully request a 45-day extension of Mr. Taylor's time to post the property securing his personal recognizance bond because, in order to secure the necessary \$500,000 in equity required by the Court's order granting bail, Mr. Taylor will be required to complete a sale of one property (which is currently under contract, but has not yet closed) and refinance the existing loan on another property owned by Mr. Taylor.

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We have discussed this request with the U.S. Attorney's Office, and the U.S. Attorney's Office does not object to the request. Moreover, the U.S. Attorney's Office has indicated that to the extent posting of property by Mr. Taylor requires the public filing of any documents, it also request that those documents not be filed until 45 days from now in order to avoid any public disclosure of the criminal case against Mr. Taylor. Accordingly, this request is consistent with that request by the Government. With the requested 45-day extension, the new deadline for Mr. Taylor to post the property securing his personal recognizance bond would be Monday, May 23, 2022.

We very much appreciate the Court's consideration of this request.

Respectfully submitted,

s/ Jonathan Streeter

Jonathan Streeter

cc: AUSA Gina Castellano, Gina.Castellano@usdoj.gov  
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Granted.  
Denise Cote  
4/8/22